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29 May 2002 JUL 17 2002

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Re MM Docket 99-325
AM IBOC Public Comments
David S. Forsman

Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

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Dear FCC AM IBOC Committee:

Thanks, again, for allowing me to make known my opinions regarding the implementation of the iBiquity AM In-Band-On-Channel (IBOC) system. From the limited amount of public information that iBiquity and the NRSC have published, I have come to the following conclusions:

(a) This system is too complicated and expensive. Most "small-market" AM station owners will find it impossible to maintain and afford. I would have preferred the FCC to adopt an independent-sideband-reduced-carrier (ISBRC) scheme to replace the current AM system.

(b) By making iBiquity the only system, and giving them the right to collect royalty fees from both transmitter and receiver manufacturers, you will have created a monopoly. This is not deemed fair business practice in the United States. If you should implement this system, then it should be optional and not mandatory.

(c) The iBiquity AM IBOC system's bandwidth exceeds the +/- 10 KHz limits set by the National Radio Systems Committee (NRSC); it will cause both first-adjacent and second-adjacent channel interference, and its bandwidth will exceed that of many directional antenna (DA) systems. Stations could be paying for not only new IBOC exciters, transmitters, and digital audio processors, but wideband DA systems and land for them as well. That represents a lot of thirty-second advertisements and second mortgages.

Please find a better alternative to the iBiquity AM IBOC system. I believe that this technology is still in its infancy, and other superior systems will eventually come along--it's just a matter of time. It would be better for the FCC to choose one good system than having to send broadcasters and listeners through a succession of inferior ones.

I believe that regardless of the digital system used, it will still rely on a fundamental analog transmission system (like ISBRC). ISBRC is flexible enough (within bandwidth limits) to accept any digital encoding method, and it will carry twice the information that conventional AM will.

Until iBiquity's AM IBOC system is made compatible with current AM bandwidth/interference limits, complexities, and costs, you would be best to drop it from further consideration

Sincerely yours,

David S. Forsman

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